

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

In re: Clifford D. Wright	)	Case Number: 17-15786
	)	Chapter 13 Proceedings
Debtor	)	Judge Arthur I. Harris

**TRUSTEE'S OBJECTION TO MOTION TO MODIFY UNCONFIRMED PLAN**

Now comes LAUREN A. HELBLING, the duly appointed, qualified, and Standing Chapter 13 Trustee herein, by and through counsel, and hereby files this objection to the motion to modify the unconfirmed plan of the debtor filed on or about November 29, 2017. In support of her objection the Trustee makes the following representations to the Court:

1. The Trustee objects to the debtor's motion for the following reasons:
  - a. The debtor has not provided proof that all the real estate she owns is insured, as requested in the Trustee's November 9, 2017 objection to confirmation.
2. The Trustee reserves the right to amend and/or supplement her objection, should additional information be provided.

WHEREFORE your Trustee, being a proper party in interest, hereby moves this Honorable Court to sustain her objection and deny the motion of the debtor for the reasons cited.

/S/ Philip D. Lamos

PHILIP D. LAMOS (#0066844)  
Attorney for Lauren A. Helbling,  
Chapter 13 Trustee  
200 Public Square, Suite 3860  
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(216) 621-4268

## CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2017, a true and correct copy of Trustee's Objection to Motion to Modify Unconfirmed Plan was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Whitney Kaster, on behalf of, Thomas J. Fistek, Debtor, at [wkaster@dannlaw.com](mailto:wkaster@dannlaw.com)

And by regular U.S. mail, postage prepaid, on:

Thomas J. Fistek, Debtor, at 3565 Radcliff Road, Cleveland Heights, OH 44121

/S/ Philip D. Lamos

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PHILIP D. LAMOS (#0066844)

LAH/pl  
12/12/17